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Of Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON  
EUGENE DIVISION**

CBT NUGGETS, LLC,

Plaintiff,

vs.

TRI NGUYEN, HUE NGUYEN, HUNG TRAN,  
JOHN CAST, MIKE SCHEWE,  
nicetodobusinesswithyou, examread,  
examworld@gmail.com, examgrand@gmail.com,  
hnt4585@gmail.com; hnt2937,

Defendants.

Case No. 6:12-cv-00291-MC

**DECLARATION OF JIM L. TATUM IN  
SUPPORT OF PLAINTIFF'S  
RESPONSE TO DEFENDANT'S  
MOTION FOR SUMMARY  
JUDGMENT**

I, Jim L. Tatum, make the following declaration on personal knowledge under penalty of perjury.

1. I am a piracy investigator for plaintiff, CBT Nuggets, LLC and I make this declaration in support of Plaintiff's Response to Defendant's Motion for Summary Judgment.

1- DECLARATION OF JIM L. TATUM IN SUPPORT OF PLAINTIFF'S RESPONSE TO DEFENDANT'S  
MOTION FOR SUMMARY JUDGMENT

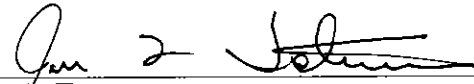
2. I have worked doing piracy investigation for more than 8 years. Plaintiff does not run a "copyright troll business" and never has. We conduct ongoing piracy investigations for the purpose of protecting CBT Nuggets' copyrights and the business itself.

3. I have investigated this case against defendants and we have evidence of multiple infringements of Plaintiff's copyrights that confirm the involvement of each of the defendants. This evidence includes email correspondence, eBay listings, eBay and PayPal correspondence, bank statements, eBay statements, PayPal statements, and the infringing CDs themselves.

4. In my investigations I used addresses other than my own and worked with other people, i.e., Greg Tatum, Jennifer Wilkinson and Edsel Garelo, who voluntarily assisted me and gave me consent to use those addresses.

*I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.*

Dated this 6<sup>th</sup> day of January, 2014.

  
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Jim L. Tatum